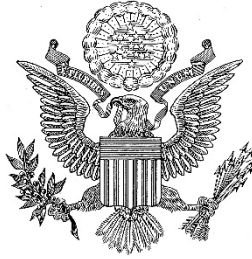


OFFICE OF THE FEDERAL PUBLIC DEFENDER
FOR THE NORTHERN DISTRICT OF NEW YORK

Syracuse Office

4 Clinton Square
3RD FLOOR
SYRACUSE, NY 13202
(315) 701-0080
(315) 701-0081 FAX

Lisa Peebles, Federal Public Defender
Anne LaFex, First Assistant



Albany Office

54 State Street
STE 310
ALBANY, NY 12207
(518) 436-1850
FAX (518) 436-1780

June 29, 2025

Hon. Miroslav Lovric
United States District Court
Binghamton U.S. Courthouse
15 Henry Street
Binghamton, NY 13901

**RE: UNITED STATES V. TUSHAL RATHOD
CASE NO. 5:25-MJ-0192 (ML)**

Dear Judge Lovric:

Please accept this letter on behalf of Tushal Rathod in anticipation of his detention hearing scheduled for June 30, 2025. Mr. Rathod is willing to put up his home as collateral to assure the Court that he will self-report to the District of Rhode Island when required. He purchased his home in Baldwinsville for \$250,000 cash. He owns his home free and clear of any mortgage, lien, or judgment.

Tushal has strong ties to the Baldwinsville community. He has an eight-year-old son who lives with him most of the time. The mother of his child, Sonya Graves, wrote a letter on behalf of Tushal that has been filed with the Court. She describes Tushal as a family man, who is deeply devoted to their son. She also describes him as a hard worker and a man of strong faith. While he is no longer in a romantic relationship with Ms. Graves, they remain close friends and have agreed to co-parent their son.

Tushal's fiancé, Kayla Spaulding, has also submitted a letter on his behalf. Ms. Spaulding also resides in the Baldwinsville community and describes Tushal as a hardworking man who has helped her raise her daughter.

At the initial appearance, the government mentioned Tushal failed to appear in court as ordered and neglected to pay court fines. Those matters involved traffic infractions that have since been resolved. According to Tushal, he retained a lawyer to assist him with clearing his license. His failure to appear was a result of being told by his lawyer that his appearance wasn't required and the matters could be addressed through the mail. He pled guilty to DWAI in 2022 and has refrained from drinking alcohol since then. He completed outpatient treatment and throughout the past three years has focused on his physical health and well-being.

Aside from traffic convictions, Tushal has no criminal history. He has been in the United States since he was 19 years old and is deeply embedded in the Baldwinsville community.

Based on the foregoing, the defense intends to request Tushal's release following the detention hearing on June 30, 2025.

Thank you for your consideration.

Respectfully,
OFFICE OF FEDERAL PUBLIC DEFENDER

By: *s/Lisa A. Peebles, Esq.*
Federal Public Defender

cc. Adrian LaRochelle, AUSA (via CM/ECF)